

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
 v.) Criminal No. 03-30047-MAP
)
)
 MELVIN RICHARDSON,)
 Defendant.)

PARTIES' JOINT MOTION TO CONTINUE

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, James R. Goodhines, Special Assistant United States Attorney, and counsel for the defense, hereby file their joint motion to continue the scheduled status conference from August 24, 2004 until September 1, 2004 at 4:00 p.m. The parties rely on the following in support thereof.

The Special Assistant United States Attorney assigned to this case has a 5 co-defendant, multiple count armed robbery case in the state court scheduled for several motions to suppress on August 18, 2004. The motions should last for three court days. The government and the defendant filed a motion to enlarge time for the government's response to the defendant's motion for discovery. The defendant had filed his discovery motions past the original filing date, and as such the government needs additional time to respond to the defendant's motion. The defendant, through his attorney, consents to this motion requesting a new date for status conference. This request does

not cause undue delay, and is in the interests of justice.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:


JAMES R. GOODHINES
Special Asst. U.S. Attorney

 /s/
VINCENT BONGIORNI, Esq.
Counsel for Defendant


Date: August 17, 2004

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
August 17, 2004

I, James R. Goodhines, Special Assistant U.S. Attorney, do hereby certify that I have served, by first class mail, a copy of the foregoing, to counsel of record.


JAMES R. GOODHINES
Special Asst. U.S. Attorney

Date: August 17, 2004